

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
DONALD WILLIAMS	:	VIOLATIONS:
	:	18 U.S.C. § 922(a)(1)(A) (dealing in firearms
	:	without a license – 1 count)
	:	18 U.S.C. § 924(a)(1)(A) (making false
	:	statements to a federal firearms licensee – 7
	:	counts)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

From at least as early as in or around November 2020 through in or around April 2023, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

DONALD WILLIAMS

willfully engaged in the business of dealing in firearms without being licensed to do so under the provisions of Chapter 44, Title 18, United States Code.

In violation of Title 18, United States Code, Sections 922(a)(1)(A) and 924(a)(1)(D).

COUNTS TWO THROUGH EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Firing Line Inc., located at 1532 South Front Street, Philadelphia, Pennsylvania, possessed a federal firearms license (“FFL”) and was authorized to deal in firearms under federal laws.
2. Unfair Advantage Tactical LLC, located at 1115 East High Street, Pottstown, Pennsylvania, possessed a FFL and was authorized to deal in firearms under federal laws.
3. Mad Minute Enterprises LLC d/b/a Delia’s Gun Shop, located at 6104 Torresdale Avenue, Philadelphia, Pennsylvania, possessed a FFL and was authorized to deal in firearms under federal laws.
4. Shot Tec LLC, located at 246 Bala Avenue, Bala Cynwyd, Pennsylvania, possessed a FFL and was authorized to deal in firearms under federal laws.
5. FFL holders are licensed, among other things, to sell firearms. Various rules and regulations, promulgated under the authority of Chapter 44, Title 18, United States Code, govern the manner in which FFL holders are permitted to sell firearms.
6. The rules and regulations governing FFL holders require that a person seeking to purchase a firearm fill out a Firearm Transaction Record, ATF Form 4473 (“Form 4473”). The Form 4473 requires that the prospective purchaser certify truthfully, subject to penalties of perjury, that he or she was the actual buyer of the firearm. The Form 4473 contains the following language in bold type: “Warning: You are not the actual buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual buyer, the dealer cannot transfer the firearm(s) to you.” In the certification section of the Form 4473, the actual buyer

must certify that his or her answers to the questions on the form are “true, correct, and complete,” and acknowledge by his or her signature that “making any false oral or written statement . . . is a crime punishable as a felony under Federal law, and may also violate State and/or local law.”

7. FFL holders are required to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder, including the buyer’s home address and date of birth, to ensure that the person was not prohibited from purchasing a firearm. For example, convicted felons are persons prohibited by law from buying firearms.

8. A person who purchases a firearm at the behest of another person and falsely states on the Form 4473 that he or she is the actual buyer of the firearm is known as a “straw purchaser.”

9. Defendant DONALD WILLIAMS was a resident of Pennsylvania, did not possess a federal firearms license (“FFL”), and was not authorized to deal, import, or manufacture firearms under federal law.

10. On or about the dates listed below, each date constituting a separate count of this indictment, in Philadelphia, Pottstown, and Bala Cynwyd, each in the Eastern District of Pennsylvania, defendant

DONALD WILLIAMS,

in connection with the acquisition of each of the firearms listed below from the FFL holders listed below, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44, Title 18, United States Code, to be kept in the FFL holders’ records, in that defendant WILLIAMS certified on the Form 4473 that he was the actual

transferee/buyer of the firearm(s), when in fact, as defendant WILLIAMS knew, these statements were false and fictitious, because WILLIAMS was purchasing the firearms on behalf of another person:

Count	Date and Dealer	Firearm(s)	Serial Number
Two	December 21, 2020 Firing Line Inc. 1532 South Front Street, Philadelphia, Pennsylvania	Smith & Wesson, model M&P40, 9mm semi-automatic pistol	DTV6965
Three	February 20, 2021 Firing Line Inc. 1532 South Front Street, Philadelphia, Pennsylvania	Smith & Wesson, model SD40VE, .40 caliber semi-automatic pistol	FCX9935
Four	April 4, 2021 Firing Line Inc. 1532 South Front Street, Philadelphia, Pennsylvania	Smith & Wesson, model 638, .38 Special caliber revolver	DNR7424
Five	May 2, 2022 Unfair Advantage Tactical LLC 1115 East High Street, Pottstown, Pennsylvania	Canik, model TP9 SF Elite, 9mm semi-automatic pistol	22BH00353
Six	November 12, 2022 Mad Minute Enterprises LLC d/b/a Delia's Gun Shop 6104 Torresdale Avenue, Philadelphia, Pennsylvania	Glock, model 19, 9mm semi-automatic pistol	BXRB584
Seven	February 13, 2023 Shot Tec LLC 246 Bala Avenue, Bala Cynwyd, Pennsylvania	Radical Firearms, model RF-15, multi-caliber semi-automatic pistol	2-098470
Eight	February 24, 2023 Shot Tec LLC 246 Bala Avenue, Bala Cynwyd, Pennsylvania	Glock, model 20, 10mm semi-automatic pistol	BXRW882

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 922(a)(1)(A), 924(a)(1)(D), and 924(a)(1)(A) set forth in this indictment, defendant

DONALD WILLIAMS

shall forfeit to the United States of America, the firearms and ammunition involved in the commission of such violations, including, but not limited to:

- 1) a Smith & Wesson, model M&P40, 9mm semi-automatic pistol, bearing serial number DTV6965;
- 2) a Smith & Wesson, model SD40VE, .40 caliber semi-automatic pistol, bearing serial number FCX9935;
- 3) a Smith & Wesson, model 638, .38 Special caliber revolver, bearing serial number DNR7424;
- 4) a Canik, model TP9 SF Elite, 9mm semi-automatic pistol, bearing serial number 22BH00353;
- 5) a Glock, model 19, 9mm semi-automatic pistol, bearing serial number BXR584;
- 6) a Radical Firearms, model RF-15, multi-caliber semi-automatic pistol, bearing serial number 2-098470; and
- 7) a Glock, model 20, 10mm semi-automatic pistol, bearing serial number BXRW882.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:

[REDACTED]

GRAND JURY FOREPERSON

/for

JACQUELINE C. ROMERO
UNITED STATES ATTORNEY

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

DONALD WILLIAMS

INDICTMENT

Counts

18 U.S.C. § 922(a)(1)(A) (dealing in firearms without a license – 1 count); 18 U.S.C. § 924(a)(1)(A) (making false statements to a federal firearms licensee – 7 counts); Notice of forfeiture

A true bill.

[REDACTED]

day,